



LAW OFFICE OF
JOSHUA D. KIRSHNER, PLLC

666 Old Country Road, Suite 501
Garden City, NY 11530

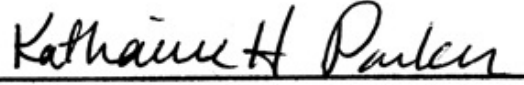
T: (212) 756-1277
jkirshner@jkirshnerlaw.com
www.jkirshnerlaw.com

June 1, 2021

VIA ECF

Hon. Katharine J. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.

06/01/2021

Re: United States v. Collado, et al. (Ramona Rodriguez)
21-mj-4834

Dear Judge Parker,

I represent Ramona Rodriguez in the above-captioned matter. On consent of the Government (Pre-Trial took no position), I write to request a modification to her conditions of release. Specifically, we request that Ms. Rodriguez be permitted to move back into her apartment located at 2557 Merion Avenue in the Bronx (the "apartment").

At the time of Ms. Rodriguez' initial appearance on May 5, 2021, the Government was concerned that instrumentalities related to the allegations against Ms. Rodriguez were still in the apartment and the Court agreed that she should not be permitted to reside there. Since her initial appearance, the apartment has been cleaned out and nothing remotely related to the charged offenses remains. Accordingly, we respectfully request that Ms. Rodriguez' conditions of release be modified so that she can return to her apartment.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

/s/
Joshua D. Kirshner

cc: All parties (via ECF)